

IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

WENDY GRAHAM, MARIA HOHN  
MIA MASK, CINDY SCHWARZ AND  
DEBRA ZEIFMAN, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

VASSAR COLLEGE,

Defendant

AFFIDAVIT OF JOHN T.  
AYERS-MANN IN  
SUPPORT OF MOTION  
TO ADMIT *PRO HAC*  
*VICE*

Case No. 23-cv-7692

JOHN T. AYERS-MANN, ESQ., being duly sworn, deposes and says:

1. I am a member of the bar of the Commonwealth of Massachusetts and the State of California and an attorney in the law firm of Seyfarth Shaw LLP, resident in its California office, located at 2029 Century Park East Suite 3500, Los Angeles, CA 90067-3021; phone number (310) 201-1513; facsimile number (617) 790-5382; email jayers-mann@seyfarth.com. Pursuant to Local Rule 1.3, I respectfully submit this affidavit in support of my application for admission *pro hac vice* to represent Vassar College ("Defendant") in the above-captioned action.

2. I have been admitted to and am a member in good standing of the Bar of the Commonwealth of Massachusetts (since 2018) and the State of California (since 2022). Annexed hereto as **Exhibit A** are Certificates of Good Standing from the Commonwealth of Massachusetts, issued on September 26, 2023, and the State of California, issued on October 3, 2023.

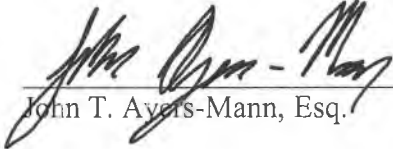
3. I have not been censured, suspended, disbarred or denied admission or readmission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice before this Court or any other Court.

4. I am not under suspension or disbarment by any Court, nor are there any pending disciplinary proceedings against me in any State or Federal Court.

5. I have never been convicted of a felony.

6. I am familiar with and agree to abide by the Federal Rules of Civil and Criminal Procedure, and the Local Rules of the United States District Court for the Southern District of New York.

WHEREFORE, I respectfully request that I be admitted *pro hac vice* to represent the Defendant in the above-captioned action in this Court.

  
John T. Ayers-Mann, Esq.

Sworn and subscribed to before  
me this 13 day of October, 2023

  
Notary Public

